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5 Attorney for Defendants  
N.F. and Angelo Ferrara  
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8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

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CORY SPENCER, an individual;  
DIANA MILENA REED, an  
individual; and COASTAL  
PROTECTION RANGERS, INC., a  
California non-profit public benefit  
corporation;

Plaintiffs,

v.

LUNADA BAY BOYS; THE  
INDIVIDUAL MEMBERS OF THE  
LUNADA BAY BOYS, including but  
not limited to SANG LEE, BRANT  
BLAKEMAN, ALAN JOHNSTON aka  
JALIAN JOHNSTON, MICHAEL  
RAE PAPAYANS, ANGELO  
FERRARA, FRANK FERRARA,  
CHARLIE FERRARA, and N.F.; CITY  
OF PALOS VERDES ESTATES;  
CHIEF OF POLICE JEFF KEPLEY, in  
his representative capacity; and DOES 1  
- 10,

Defendants.

Case No: 2:16-cv-02129-SJO-RAO

Assigned to District Judge:  
Hon. S. James Otero; Courtroom: 10C  
@ 350 W. First Street, L.A., CA 90012

Assigned Discovery:  
Magistrate Judge: Hon. Rozella A. Oliver

**DECLARATION OF MARK C.  
FIELDS IN SUPPORT OF  
DEFENDANT ANGELO FERRARA'S  
MOTION FOR PARTIAL SUMMARY  
JUDGMENT**

[Filed concurrently with Notice, Motion  
and Points and Authorities For Partial  
Summary Judgment; [Proposed] Separate  
Statement of Uncontroverted Facts;  
[Proposed] Order]

Date: August 21, 2017  
Time: 10:00 a.m.  
Ctrm: 10C; Hon. S. JAMES OTERO

Complaint Filed: March 29, 2016  
Trial: November 7, 2017

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**DECLARATION OF MARK C. FIELDS**

I, Mark C. Fields, do hereby declare and state as follows:

1. I am an attorney duly admitted to practice in all courts of the State of California. I am a member of Law Offices Of Mark C. Fields, APC, attorney of record for Angelo Ferrara. I submit this Declaration in support of the Motion by Angelo Ferrara for Partial Summary Judgment. I have personal knowledge of the following facts, and could and would competently testify thereto.

2. Please find attached hereto as Exhibit A true and correct copies of select excerpts of the deposition transcript of Plaintiff Cory Eldon Spender's deposition conducted on October 11, 2016.

3. Please find attached hereto as Exhibit B true and correct copies of select excerpts of the deposition transcript of Plaintiff Diana Milena Reed's deposition conducted on October 24, 2016.

4. Please find attached hereto as Exhibit C true and correct copies of select excerpts of the deposition transcript of Plaintiff Diana Milena Reed's deposition conducted on October 25, 2016.

5. Pursuant to Local Rule 7-3, I meet on July 14, 2017 with Plaintiffs' counsel Kurt Franklin, Samantha Wolff, and Vic Otten and discussed the substance of this Motion and potential resolution. Also participating were other counsel for other of the Individual Defendants.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed on July 24, 2017 at Los Angeles, California.

/s/ Mark C. Fields  
Mark C. Fields

# EXHIBIT A

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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

CORY SPENCER, an individual;	)	Case No.
DIANA MILENA REED, an	)	2:16-cv-02129-SJO-RAO
individual; and COASTAL	)	
PROTECTION RANGERS, INC., a	)	
California non-profit public	)	
benefit corporation,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
LUNADA BAY BOYS; THE	)	
INDIVIDUAL MEMBERS OF THE	)	
LUNADA BAY BOYS, including	)	
but not limited to SANG LEE,	)	
BRANT BLAKEMAN, ALAN JOHNSTON	)	
aka JALIAN JOHNSTON, MICHAEL	)	
RAE PAPAYANS, ANGELO FERRARA,	)	
FRANK FERRARA, CHARLIE	)	
FERRARA and N.F.; CITY OF	)	
PALOS VERDES ESTATES;	)	
CHIEF OF POLICE JEFF KEPLEY,	)	
in his representative	)	
capacity; and DOES 1-10,	)	
	)	
Defendants.	)	
	)	

DEPOSITION OF CORY ELDON SPENCER  
Los Angeles, California  
Tuesday, October 11, 2016

Reported by:  
Carmen R. Sanchez  
CSR No. 5060

1           A           Yes.

2           Q           Okay.

3                       How many times?

4           A           I can't recall a specific number, but I  
5 can tell you that, of course, you see it in magazines.  
6 You want to see it in person; and, you know, you want  
7 to go and investigate, I guess, for lack of a better  
8 term; so, you just drive up and check it out.

9           Q           Are you able to estimate for me how many  
10 times you went to Lunada Bay before you turned 20?

11          A           Oh, before I turned 20? If I were to  
12 give you an estimation, probably four to five times.

13          Q           Okay.

14                       During any of the four or five times you  
15 went there before you turned 20, did you experience  
16 anything that made you fearful of Lunada Bay?

17          MR. FRANKLIN: Vague and ambiguous.

18          THE WITNESS: Fearful? Just going there I was  
19 in fear. Just driving up the Palos Verdes Peninsula  
20 road, you know, or whatever road it is to get up there,  
21 you're a little afraid because you've heard stories.

22          MS. HEWITT: Okay.

23          Q           During the four or five times you went  
24 to Lunada Bay before you turned 20, did you experience  
25 anything that made you fearful of Lunada Bay?

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1 A Let me back up.

2 Q Sure.

3 A I had my boards each time but ...

4 Q When you were -- before you were 20?

5 A Yes.

6 Q Okay. So you had your boards, but you  
7 didn't surf?

8 A Correct.

9 Q That's fine. And between that time and  
10 January 2016, did you ever surf at Lunada Bay?

11 A No.

12 Q Okay.

13 Between those four to five times and  
14 January 2016, did you go to Lunada Bay?

15 A Yes.

16 Q Okay.

17 About how many times?

18 A Four to five.

19 Q Between the time you were 20 and the  
20 time January 2016?

21 A Oh, oh, I'm sorry.

22 Q That's okay.

23 A I thought we were back.

24 Q No.

25 A How many times after I was 20 and, then,

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1 on the board or something like that, and I don't know  
2 who that was. From what I remember, I don't think they  
3 were currently a member of them, but they used to be.  
4 I don't remember who it was.

5 Q Okay.

6 Put that right to the side because I'm  
7 going to ask you some more questions about this E-mail.

8 A Which one?

9 Q The one we just looked at. Yeah, put  
10 that off, because I'm going to come back to that.  
11 Going back real briefly to the complaint on page 13,  
12 following the February 2016 visit to Lunada Bay, did  
13 you ever return to Lunada Bay and attempt to surf?

14 A No.

15 Q Did you ever return to Lunada Bay and --  
16 at all after that time?

17 A I have, yes.

18 Q All right.

19 How many times?

20 A Anywhere from three to five.

21 Q Okay.

22 On each of those visits, did you go down  
23 to the beach?

24 A No. Up on the bluff only.

25 Q Okay.

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EXAMINATION

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BY MR. FIELDS:

Q My name is Mark Fields. I represent Angelo Ferrara and N.F. Let's talk about Angelo Ferrara first. Of all the types of wrongful conduct that you've alleged, whether it's physical harassment, yelling, screaming, throwing dirt, videoing, or intimidating in any fashion, are you aware of any incidents where Angelo Ferrara has done that?

MR. FRANKLIN: Vague and ambiguous; compound.

THE WITNESS: Well, I mean, you know, I don't know specifically quite how to answer that in specifics, other than to say that, you know, he's been identified as a Bay Boy through investigation counsel's done; and whether or not he's part of that concerted effort that I spoke about earlier today, either on the phone, if he was on the other end of the phone, I don't know if he's one of the Bay Boys that contributed to any of that.

BY MR. FIELDS:

Q So you have no personal knowledge of that, of Angelo engaging in any of those activities?

A Well, like I said, I don't know if he was one on the phone or on the other end of the line that contributed, you know, to when they would show up



1 and get in your face with a video or yell at you. I  
2 don't know if he was one that would show up. I don't  
3 know.

4 Q Would you recognize him if you saw him?

5 A I would not.

6 Q How about N.F.? Do you have any  
7 knowledge, personal knowledge, of him engaging in any  
8 of those types of activities you've alleged?

9 A Again, my same answer.

10 Q Now, going beyond personal knowledge,  
11 other than what you've learned from your counsel, have  
12 you had any discussions with anyone else regarding any  
13 type of wrongful activity by Angelo Ferrara?

14 A All I can tell you is this, that on more  
15 than one occasion even in uniform on duty I've had  
16 people come up to me -- I don't know who they are. The  
17 last time was on a burglary call in a perimeter where I  
18 was standing on a street corner. Somebody came up to  
19 me on a bike. I don't know who he was. Thanked me up  
20 and down. As, you know, I'm telling the guy, "Hey, I'm  
21 busy here," you know, he's thanking me for what I've  
22 been doing on the lawsuit. This has been going on too  
23 long. All of those guys you got named in there are --  
24 and even more are dirty involved in it.

25 Q Do you know who?

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1           A           That was the last time, and there's been  
2 a few of those.

3           Q           Do you know the names of any of those  
4 people who gave you those "kudos," for lack of a better  
5 word?

6           MR. FRANKLIN: Asked and answered.

7           THE WITNESS: I do not.

8 BY MR. FIELDS:

9           Q           Of the people who gave you those kudos  
10 and said, "Thank you for doing this. The Bay Boys are  
11 bad," however you want to phrase it, did any of them  
12 specifically mention Angelo Ferrara?

13          A           That's a name that keeps coming up as  
14 one of the more prominent names who has been involved  
15 over the years. Like I said, I can't identify to you a  
16 Ferraro -- Ferrara from the next Ferrara, but that is a  
17 very popular name associated with the Bay Boys through  
18 casual conversations that I have had from people  
19 thanking me in the surfing community for doing what I'm  
20 doing.

21          Q           And the people who thanked you, they  
22 haven't distinguished one Ferrara from the next to you?

23          A           No. Just the name. It's synonymous  
24 with that place.

25          Q           With -- take a look at the supplemental

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1 disclosures. I forget what exhibit that is. It was  
2 marked, I think, before I got here.

3 MR. WORGUL: Thirty-four.

4 BY MR. FIELDS:

5 Q Thirty-four, plaintiff's supplemental  
6 disclosures, No. 28 makes a reference to "the  
7 Ferraras."

8 A We're on page 28?

9 Q No, Witness 28. We're on page 10.

10 MR. FRANKLIN: The number.

11 BY MR. FIELDS:

12 Q And it's regarding reference to  
13 Jim Russi, R-u-s-s-i.

14 A Do you want me to read that section?

15 Q I'll read it. I have a question about  
16 in that paragraph, it says (as read):

17 "Plaintiffs are informed and  
18 believe and on that basis allege that  
19 this witness [Jim Russi] has information  
20 regarding the illegal activities of the  
21 Lunada Bay Boys including the Ferraras."

22 Do you know what information Mr. Russi  
23 has regarding the Ferraras?

24 A I personally don't. Through  
25 investigation through counsel, what they learned, that

Page 220

1 information.

2 Q And you don't know which Ferrara it is  
3 referenced in 28?

4 A In reference to what you just read?

5 Q Yes.

6 A I do not specifically, no.

7 Q Now, I think the only other time that I  
8 noticed a Ferrara being mentioned is on 60, the  
9 Witness 60 page 19.

10 A Okay.

11 Q And Ken Claypool, that's someone who you  
12 know; correct?

13 A That is one who I had met two times and  
14 just on a very informal basis, when you say, "know";  
15 so, it's relative.

16 Q I appreciate that.

17 Then it says (as read):

18 "This witness will testify about  
19 several incidents of harassment at  
20 Lunada Bay involving Individuals such as  
21 Brant Blakeman and possibly one or more of  
22 the Ferraras."

23 Do you know what information  
24 Ken Claypool has regarding the Ferraras?

25 A I do not.

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1 Q Other than what you've heard sort of  
2 informally from people that you've met who haven't  
3 identified themselves and information you have received  
4 from your counsel, do you have any information  
5 regarding wrongful conduct by Angelo Ferrara or N.F.?

6 MR. FRANKLIN: Vague and ambiguous.

7 BY MR. FIELDS:

8 Q Wrongful conduct of the type alleged in  
9 this complaint?

10 A Again, it goes back to original, when we  
11 started out. I don't know if they were on the other  
12 end of that phone or if they were the ones showing up  
13 in those numbers on the bluff. So, I -- I can't give  
14 you an answer "Yes" or "No." I don't know.

15 MR. FIELDS: I have no further questions.

16

17 EXAMINATION

18 BY MR. WORGUL:

19 Q Mr. Spencer, my name is John Worgul.  
20 I'm counsel for Brant Blakeman.

21 Just real quickly, what's your height  
22 and weight?

23 A My height and weight?

24 Q Yeah.

25 A Five-two, 115 at my last physical.

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# EXHIBIT B

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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

CORY SPENCER, an individual; DIANA )	)
MILENA REED, an individual; and )	)
COASTAL PROTECTION RANGERS, INC., a )	)
California non-profit public benefit )	)
corporation, )	) Case No.
	) 2:16-cv-02129-SJO-RAO
Plaintiffs, )	)
	)
vs. )	)
	)
LUNADA BAY BOYS, et al., )	)
	)
Defendants. )	)

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VIDEOTAPED DEPOSITION OF DIANA MILENA REED  
Santa Monica, California  
Monday, October 24, 2016

REPORTED BY:  
Jimmy S. Rodriguez  
CSR No. 13464

1 sentence it says you wanted to paddle out to 11:49

2 experience the large waves found off Lunada Bay. 11:49

3 In this sentence in your complaint here, 11:49

4 did you mean that you wanted to go out and try to 11:49

5 surf or you just wanted to paddle off to -- paddle 11:49

6 out to see what the waves looked like? 11:49

7 MR. FRANKLIN: Vague and ambiguous. 11:49

8 THE WITNESS: I wanted to paddle out to 11:49

9 surf. 11:49

10 BY MS. HEWITT: 11:49

11 Q Did you intend to surf? 11:49

12 A I did intend to surf, yes. 11:49

13 Q Did you feel prepared that day to catch a 11:49

14 big wave, whatever you thought was a big wave that 11:49

15 day? 11:49

16 A I felt prepared that day to attempt to 11:49

17 catch some of the waves on the inside for the 11:49

18 conditions that were out that day. 11:49

19 Q How did you decide to go to Lunada Bay 11:49

20 that day? 11:49

21 A I don't remember specifically how I 11:49

22 decided to go to Lunada Bay that day. I would 11:50

23 assume that the swell -- there was a good swell and 11:50

24 it wasn't, you know, too big, you know, and it was a 11:50

25 size that was something that I could try and 11:50

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Hahn & Bowersock, A Veritext Company

800.660.3187



1 attempt. 11:50

2 Q I think earlier we decided that we weren't 11:50

3 sure whether or not you'd been to Lunada Bay before 11:50

4 that day. 11:50

5 A I didn't say that. 11:50

6 Q My fault. 11:50

7 Had you been to Lunada Bay before 11:50

8 January 29, 2016? 11:50

9 A I had been to the top of the bluff. 11:50

10 Q Top of the bluff, okay. 11:50

11 Do you remember -- is it like towards the 11:50

12 beginning of January, middle of January? 11:50

13 A It was towards the beginning of January. 11:50

14 I think that it was around the 6th of January 11:50

15 approximately. 11:50

16 Q And before that time on approximately the 11:50

17 6th of January, had you ever been to the top of the 11:50

18 bluff at Lunada Bay before? 11:50

19 A I don't think so. I may have at one point 11:51

20 driven up the coast looking at the coast, but I 11:51

21 don't know if I stopped at Lunada Bay or not. And 11:51

22 that wasn't for surfing. It was for scenic reasons. 11:51

23 Q Okay. Just to be clear so I don't get it 11:51

24 wrong again: Before January 6, 2016, had you ever 11:51

25 been down to the beach at Lunada Bay? 11:51

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1           A       I didn't go down to the beach on           11:51  
2           January 6th.   11:51  
3           Q        I understand that, I'm just making sure       11:51  
4           before that date you had never gone to the beach       11:51  
5           there?   11:51  
6           A        No.   11:51  
7           Q        And had you ever stopped at Lunada Bay at       11:51  
8           all before January 6, 2016?                       11:51  
9           MR. FRANKLIN: Asked and answered.           11:52  
10          THE WITNESS: Yeah, I may have when I was       11:52  
11          looking at the coast, I don't know.           11:52  
12          BY MS. HEWITT:                                   11:52  
13          Q        Okay. So in January 6, 2016, where did       11:52  
14          you stop on the bluff?                           11:52  
15          A        I went there to watch my friend surf.       11:52  
16          Q        Who was that?                           11:52  
17          A        It was a big day. Much too big for me.       11:52  
18                   So I just went there to watch.           11:52  
19          Q        Who was your friend?                   11:52  
20          A        Well, my friend Jordan Wright, boyfriend,   11:52  
21          and his friends.                                   11:52  
22          Q        Who was his friends that you went to       11:52  
23          watch?   11:52  
24          A        One of them was my friend Preston, I don't   11:52  
25          remember his last name. A friend of Jordan's called   11:52

1 A So I can't say one way or the other. 13:10

2 Q I'm not asking you to say one way or the 13:10

3 other. I'm asking you to state if right now you 13:10

4 have a memory of being intimidated by someone on top 13:10

5 of the bluff. 13:10

6 MR. FRANKLIN: Vague and ambiguous. 13:10

7 THE WITNESS: I would have to think about 13:10

8 it more, I just don't know. 13:10

9 BY MS. HEWITT: 13:10

10 Q Do you remember that right now? 13:10

11 MR. FRANKLIN: Vague and ambiguous. 13:10

12 THE WITNESS: Right now, I don't remember 13:10

13 what happened on top of the bluff much, so it would 13:10

14 be hard for me to make that -- sorry. 13:10

15 BY MS. HEWITT: 13:10

16 Q Do you recall any vandalism that day? 13:10

17 A I don't recall vandalism on February 5th. 13:10

18 Q Did the police escort you down the bluff 13:10

19 that day? 13:10

20 A I don't know. 13:10

21 Q You don't remember? 13:10

22 A I don't remember. 13:10

23 Q Okay. Going to February 13th, as 13:10

24 described in your complaint, why did you decide to 13:11

25 go to Lunada Bay on February 13th? 13:11

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# EXHIBIT C

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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

CORY SPENCER, an individual; DIANA )	)
MILENA REED, an individual; and )	)
COASTAL PROTECTION RANGERS, INC., a )	)
California non-profit public benefit)	)
corporation,	) Case No.
	) 2:16-cv-02129-SJO-RAO
Plaintiffs,	)
	)
vs.	)
	)
LUNADA BAY BOYS, et al.,	)
	)
Defendants.	)
	)

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VIDEOTAPED DEPOSITION OF DIANA MILENA REED  
VOLUME II  
Santa Monica, California  
Tuesday, October 25, 2016

REPORTED BY:  
Jimmy S. Rodriguez  
CSR No. 13464

1 Q It's F-a-l-k? Spelled F-a-l-k, Falk? 13:24

2 A No, Fox, like the animal fox, F-o-x. 13:24

3 Yeah, Tyler Fox, he got fourth place in Mavericks, I 13:24

4 believe, this year. 13:24

5 MR. DIEFFENBACH: Thanks. That's all I 13:24

6 have, thanks. 13:24

7 MR. FIELDS: Briefly. 13:24

8 Off the record. 13:25

9 THE VIDEOGRAPHER: We are now off the 13:25

10 record. The time is 1:25 p.m. 13:25

11 (Break taken.) 13:30

12 THE VIDEOGRAPHER: We're now back on the 13:32

13 record. The time is 1:32 p.m. 13:32

14 13:32

15 EXAMINATION 13:32

16 BY MR. FIELDS: 13:32

17 Q Good afternoon, Ms. Reed, you realize 13:32

18 you're still under oath? 13:32

19 A Yes. 13:32

20 Q Have you ever met Angelo Ferrara? 13:32

21 A I don't recall if I've met him. And, 13:32

22 again, I'm not sure what you mean by "meet," do you 13:32

23 mean by seeing him? 13:32

24 Q Let's start with that, have you ever seen 13:32

25 him? 13:32

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1           A       I'm not sure if I've seen him or not.           13:32

2           Q       If you were to walk into the room, would           13:32

3           you recognize him?           13:32

4           A       Yeah, I know what he looks like.           13:32

5           Q       What does he look like?           13:32

6           A       An older man, middle-aged man, not very           13:32

7           distinguishable, grayish hair.           13:32

8           Q       Any sense of his height?           13:32

9           A       I don't know his height.           13:32

10          Q       Do you know whether he's closer to 5-5 or           13:32

11          6-5?           13:32

12          A       I would assume that he's probably closer           13:32

13          to like 5-10 -- not 5-10, but 5-11 to six-foot, I'm           13:33

14          not sure, that's a guess.           13:33

15          Q       How do you know that anyone that you've           13:33

16          seen is Angelo Ferrara; has he ever introduced           13:33

17          himself to you?           13:33

18          A       He has not introduced himself to me.           13:33

19          Q       Has anyone pointed him out and said,           13:33

20          That's Angelo Ferrara?           13:33

21          A       I don't recall anyone doing that.           13:33

22          Q       So what makes you think that if someone           13:33

23          walked in the door you would know whether he'd be           13:33

24          Angelo Ferrara versus any other member of the human           13:33

25          race?           13:33

1 A I don't know, I would do my best. 13:33

2 Q Have you ever -- have you ever personally 13:33  
3 been harassed by in any manner by Angelo Ferrara? 13:33

4 A I don't think I've had any personal 13:33  
5 interactions with him that I know of. 13:33

6 Q Have you ever heard of -- has anyone told 13:33  
7 you that they either have been harassed by 13:33  
8 Angelo Ferrara or have known of situations where 13:33  
9 Angelo Ferrara harassed anybody? 13:34

10 MR. FRANKLIN: Vague, ambiguous. 13:34

11 THE WITNESS: I've heard various things in 13:34  
12 the surf community. You know, I've also relied on 13:34  
13 the investigation of my attorneys. 13:34

14 BY MR. FIELDS: 13:34

15 Q Other than what your attorneys have told 13:34  
16 you, what have you heard in the surf community about 13:34  
17 what Angelo Ferrara may have done whether it's 13:34  
18 harassing or assault or any type of the wrongful 13:34  
19 acts alleged in the complaint? 13:34

20 A I mean, I've talked to Charlie Ferrara and 13:34  
21 I've had several conversations with him. Charlie 13:34  
22 told me that the harassment has been continuing for 13:34  
23 a very long time. He told me that -- that Angelo 13:34  
24 and his brother were some of the original Bay Boys 13:34  
25 and that they're all a family and that they're all, 13:34

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